

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

DAVID DELL'AQUILA, on behalf of)
himself and all others similarly situated,)
Plaintiffs,)
v.) No. 3:19-cv-00679
WAYNE LAPIERRE, the NATIONAL) Judge Campbell
RIFLE ASSOCIATION OF AMERICA,) Magistrate Frensley
and the NRA FOUNDATION, INC.)
Defendants.)

**UNOPPOSED MOTION FOR EXTENSION
OF TIME TO FILE RESPONSIVE PLEADING**

Defendants respectfully move this Court for an extension of time up to and including February 19, 2020 to answer or otherwise respond to Plaintiffs Second Amended Complaint (D.E. 43). In support of this Motion, Defendants state as follows:

1. Plaintiff filed his Second Amended Complaint (D.D. 43) on January 22, 2020, making the default response deadline February 5, 2020. *See L.R. 7.01(3).*
2. On January 24, 2020, undersigned counsel communicated with Plaintiff's counsel, who does not oppose this motion.

For these reasons, Defendants respectfully request the Court grant this Motion and give an extension of time up to and including February 19, 2020 to answer or otherwise respond to Plaintiff's Second Amended Complaint.

Dated: January 27, 2020

Respectfully Submitted,

NEAL & HARWELL, PLC

/s/ William J. Harbison II

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Counsel for Defendant NRA Foundation, Inc.

AGREED TO AND APPROVED FOR ENTRY:

/s/ William A. Brewer
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Attorneys for the NRA and LaPierre Defendants:

CERTIFICATE OF SERVICE

I certify that I caused a true and correct copy of the foregoing to be electronically filed with the Clerk of the Court on January 27, 2020, using the CM/ECF system, which will send notification to all counsel of record as listed below.

<u>Attorneys for the NRA and LaPierre Defendants:</u>	<u>Attorney for Plaintiff:</u>
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/s/ William J. Harbison II